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2 2. On October 21, 2011, the Parties filed a Stipulation And Proposed Order Selecting
3 ADR Process [Doc. No. 17], selecting mediation and requesting a deadline of 120 days in which
4 to complete the mediation.

5 3. On October 24, 2011, the Court entered an Order referring the case to mediation and
6 setting a mediation deadline of February 20, 2012 [Doc. No. 19].

7 4. On November 3, 2011, Trans Union filed a Notice Of Motion And Motion To
8 Dismiss Plaintiff's Complaint Pursuant To Rule 12(b)(6) For Failure To State A Claim Upon
9 Which Relief Can Be Granted (the "Motion") [Doc. No. 20].

10 5. A hearing on the Motion is scheduled for March 27, 2012 [Doc. No. 24], along with
11 a Case Management Conference.

12 6. The parties believe that mediation will not be productive until after the Court has
13 ruled on the Motion and respectfully request that the deadline for completing the mediation be
14 re-set for 90 days from the Court's ruling on the Motion.

15 7. This Joint Stipulation will not alter the date of any event or deadline already fixed by
16 the Court, other than the existing mediation deadline.

17 8. The only previous time modifications in this case were by stipulation of the parties
18 to extend Trans Union's time to answer or otherwise respond to Plaintiff's Complaint [Doc. No.
19 8] and to extend the briefing schedule for Trans Union's Motion To Dismiss Plaintiff's
20 Complaint Pursuant To Rule 12(b)(6) [Doc. No. 22].

21 9. This Joint Stipulation is not made for the purposes of delay and would not prejudice
22 any party.

23 THEREFORE, IT IS HEREBY STIPULATED between the Parties that the deadline for
24 completing mediation shall be re-set for 90 days from the Court's ruling on Trans Union's
25 Motion To Dismiss Plaintiff's Complaint Pursuant To Rule 12(b)(6) For Failure To State A
26 Claim Upon Which Relief Can Be Granted [Doc. No. 20].

1 SO STIPULATED by:

2
3 Date: 12/01/11

s/William R. Brown

William R. Brown, Esq. (IN #26782-48)

(admitted *Pro Hac Vice*)

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Local Counsel for Defendant Trans Union, LLC

17 Date: 11/29/11

s/John R. Botti, III (w/consent)

John R. Botti, III

Pro Se Plaintiff

1163 Capri Drive

Campbell, CA 95008-6003

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25 Dated: 12/6/11


UNITED STATES DISTRICT JUDGE

1 UNITED STATES DISTRICT COURT
2 FOR THE
3 NORTHERN DISTRICT OF CALIFORNIA
4
5

6 BOTTI et al,

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8 Plaintiff,

9
10 v.

11
12 TRANS UNION LLC et al,

13
14 Defendant.
15 _____/

16
17 Case Number: CV11-04519 SBA
18

19 **CERTIFICATE OF SERVICE**
20
21

22 I, the undersigned, hereby certify that I am an employee in the Office of the Clerk, U.S. District
23 Court, Northern District of California.
24

25 That on December 7, 2011, I SERVED a true and correct copy(ies) of the attached, by placing
26 said copy(ies) in a postage paid envelope addressed to the person(s) hereinafter listed, by
27 depositing said envelope in the U.S. Mail, or by placing said copy(ies) into an inter-office
28 delivery receptacle located in the Clerk's office.

JOINT STIPULATION FOR ENLARGMENT OF TIME FOR PARTIES TO COMPLETE MEDIATION – 4:11-CV-04519-SBA

John R Botti

1163 Capri Drive

Campbell, CA 95008-6003

Dated: December 7, 2011

Richard W. Wieking, Clerk

By: LISA R CLARK, Deputy Clerk

PROOF OF SERVICE

I, William R. Brown, declare that I am a resident of the State of Indiana, am over the age of eighteen years and am not a party to the within action. I am employed with Schuckit & Associates, P.C., whose address is 4545 Northwestern Drive, Zionsville, IN 46077. On **December 1, 2011**, I served the following documents:

JOINT STIPULATION FOR ENLARGMENT OF TIME FOR PARTIES TO COMPLETE MEDIATION

I served the documents on the persons listed below, as follows:

<input type="checkbox"/>	By messenger service. I served the documents by placing them in an envelope or package addressed to the persons listed below and providing them to a professional messenger service for service. (A declaration by the messenger is attached hereto as a separate document.)
<input checked="" type="checkbox"/>	By United States mail. I enclosed the documents in a sealed envelope or package addressed to the persons listed below and placed the envelope or

package for collection and mailing in accordance with our ordinary business practices. I am readily familiar with my firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Zionsville, Indiana.

All documents were sent to the following persons in the following manner:

John R. Botti, III
1163 Capri Drive
Campbell, CA 95008-6003

I declare under penalty of perjury under the laws of the State of Indiana that the foregoing is true and correct, and that this Proof of Service was executed on this **1st** day of **December, 2011**, at Zionsville, Indiana.

s/William R. Brown
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